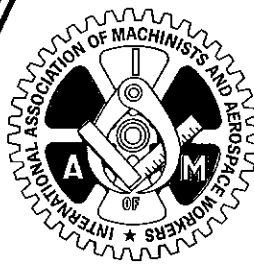


**International
Association of
Machinists and
Aerospace Workers**



9000 Machinists Place
Upper Marlboro, Maryland 20772-2687

Area Code 301
967-4500



OFFICE OF THE GENERAL VICE PRESIDENT

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FOREIGN-TRADE ZONES BOARD
EDUCATION SECRETARY

December 8, 2008

RE: Opposition to application for
Foreign-Trade Zone 82—Mobile, AL;
Application for Subzone;
ThyssenKrupp Steel and Stainless
USA, LLC (Stainless and Carbon
Steel Products), Calvert, AL

Andrew McGilvray
Executive Secretary
Foreign-Trade Zones Board,
U.S. Department of Commerce, Room 2111
1401 Constitution Avenue, NW,
Washington, DC 20230

Dear Mr. McGilvray:

Please find attached one original and three copies of the International Association of Machinists and Aerospace Workers submission with respect to the above-referenced matter.

Respectfully submitted,

Richard P. Michalski
General Vice President

RPM:cep

**COMMENTS OF THE INTERNATIONAL ASSOCIATION OF MACHINISTS
AND AEROSPACE WORKERS, REGARDING ITS OPPOSITION TO
FOREIGN-TRADE ZONE 82—MOBILE, AL; APPLICATION FOR SUBZONE;
THYSSENKRUPP STEEL AND STAINLESS USA, LLC, (STAINLESS AND
CARBON STEEL PRODUCTS), CALVERT, AL
(Docket 51-2008)**

Pursuant to the request for public comment, (73 Fed. Reg. 38535-38536, October 7, 2008) concerning the above-referenced matter, Foreign-Trade Zone 82—City of Mobile, (“application” or “Foreign-Trade Zone 82”) the International Association of Machinists and Aerospace Workers (“IAM”) files these comments urging the Foreign Trade Zones Board to reject the application.

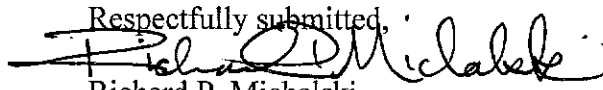
Local Lodge 1943 of the International Association of Machinists and Aerospace Workers (“IAM Local 1943”) represents over 1,600 workers at Middletown Works of AK Steel in Middletown, Ohio (“Middletown Works”). Workers at this facility, and elsewhere in the United States, would be adversely affected by granting the request for special purpose subzone status for ThyssenKrupp Steel and Stainless, USA, LLC (“ThyssenKrupp”). Among other things, permitting the Alabama site to import inputs duty free would significantly disadvantage competed U.S. mills, such as Middletown Works, that are currently required to pay duties on their imports. Granting such an advantage to ThyssenKrupp would be unfair and have a significantly negative impact on workers represented by IAM Local 1943 at AK Steel.

Granting the application would also have serious consequences to workers throughout the U.S. steel and related industries. Over three million manufacturing jobs have been lost in the U.S., in the past few years, many in the steel industry. Given the current economic crisis, reflected by an unemployment rate that surged to 6.7% last

month, the Foreign Trade Zones Board must not take any action that would further contribute to growing unemployment. If accepted, the request reflected by the application would place further pressure on an already distressed industry and would greatly exacerbate current unemployment.

Contrary to having a positive effect on the U.S. economy, the application, if granted, would adversely affect the U.S. economy, as explained in other opposing comments submitted to the Foreign Trade Zones Board concerning this matter.

The application fails to meet the required standards for granting approval of such a request (see, 15 C.F.R. Secs. 400.31(a), (b)(2), and (c)(3)). In view of the aforementioned, the IAM, urges the Foreign-Trade Zones Board to reject the application.

Respectfully submitted,

Richard P. Michalski
IAM General Vice President